

O'DESS and  
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Via Electronic Service Only

April 26 2018

Reed J. Peterson  
Reed Peterson & Associates  
6601 Grand Teton Plaza, Ste. B2  
Madison, WI 53719

RE: *Rudy V. Byron, Jr. and Maritza Y. Byron*  
Case No. 15-21670-svk

Dear Attorney Peterson:

Pursuant to the bankruptcy court's order January 18, 2017, approving the parties' stipulation resolving the motion for relief from automatic stay and abandonment with respect to the property at 5134 Pine Tree Circle, Racine, Wisconsin 53402, Wilmington Savings Fund Society, F.S.B., *dba* Christiana Trust, not in its individual capacity but solely as trustee for the Brougham Fund I Trust renews the motion due to debtors' failure to maintain post-petition mortgage payments as they came due for November 1, 2017, through April 1, 2018, at \$3,344.67, each; minus un-applied funds of \$851.26; for a total of \$19,216.76; plus, attorneys' fees for this renewed motion. A copy of the post-petition payment history is attached.

**If you do not want the court to grant relief from the automatic stay or abandonment, or if you want the court to consider your views on this renewed motion then within 14 days of the date indicated on this letter, you or your attorney must file with the court a written response explaining your position and requesting a hearing with the court. The failure to do so may result in the court granting the relief requested in the original motion, including termination of the automatic stay and abandonment of the Property from the bankruptcy estate.**

CERTIFICATE OF SERVICE

The undersigned certifies that on this 26 day of April, 2018, he caused a copy of this renewed motion to be served by U.S. mail on debtors, Rudy V. Byron, Jr. and Maritza Y. Byron, at 5134 Pine Tree Circle, Racine, Wisconsin 53402, and, on the same date by electronic means *via CM/ECF* on debtors' counsel, Reed J. Peterson; and, on the chapter 13 trustee, Scott Lieske, and the office of the United States Trustee.

Very truly yours,

D. Alexander Martin

O'Dess and Associates, S.C., is attempting to collect a debt and any information obtained will be used for that purpose. If you have previously received a Chapter 7 Discharge in Bankruptcy, this correspondence should not be construed as an attempt to collect a debt.

RUDY V. BYRON, JR and MARITZA Y. BYRON  
 Bankruptcy Case No. 15-21670-SVK  
 5134 PINE TREE CIRCLE, RACINE, WISCONSIN 53402

Based on the regularly-maintained records of the mortgage servicer, the following is a summary of the debtors' payment history since post-petition mortgage payments were last current:

	Date Payment Due	Amount Due	Date Payment Received	Amount Received	Post-Petition Month Applied As	Suspense Balance
1	1/1/2017	\$3,180.28	1/11/2017	\$3,112.74		\$3,112.74
2	2/1/2017	\$3,180.28	8/7/2017	\$3,112.74	1/1/2017	\$3,045.20
3	3/1/2017	\$3,180.28	9/11/2017	\$3,344.67	2/1/2017	\$3,209.59
4	4/1/2017	\$3,180.28			3/1/2017	\$29.31
5	5/1/2017	\$3,180.28	10/11/2017	\$3,344.67	4/1/2017	\$193.70
6	6/1/2017	\$3,180.28	11/14/2017	\$3,344.67	5/1/2017	\$358.09
7	7/1/2017	\$3,180.28	12/11/2017	\$3,344.67	6/1/2017	\$522.48
8	8/1/2017	\$3,180.28	1/17/2018	\$3,344.67	7/1/2017	\$686.87
9	9/1/2017	\$3,344.67	2/13/2018	\$3,344.67	8/1/2017	\$851.26
10	10/1/2017	\$3,344.67	3/12/2018	\$3,344.67	9/1/2017	\$851.26
11	11/1/2017	\$3,344.67	4/3/2018	\$3,344.67	10/1/2017	\$851.26
12	12/1/2017	\$3,344.67				
13	1/1/2018	\$3,344.67				
14	2/1/2018	\$3,344.67				
15	3/1/2018	\$3,344.67				
16	4/1/2018	\$3,344.67				